

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

SEALED
FILED

UNITED STATES OF AMERICA,

Plaintiff,

v.

WINSTON LEVERT HANKS, JR.,
ZECHARIAH ODIE HANKS,
CHRISTIAN EUGENE DEWAYNE
DUCKWORTH,
JOLENE ROGERS a/k/a Jolene Copeland,
and ALBERTO RAFAEL MENDEZ
LIZARRAGA,

Defendants.

SEALED

OCT 12 2023

BONNIE HACKLER
Clerk, U.S. District Court

By _____
Deputy Clerk

Case No.

23 CR 186 JFH

INDICTMENT

The Federal Grand Jury charges:

INTRODUCTION

At all times relevant to this Indictment:

1. **WINSTON LEVERT HANKS, JR.** resided at 301 E 2nd Penn West, Holdenville, Oklahoma, and was associated with and owned the addresses located at 201 Vorhees Street, Holdenville, Oklahoma; 203 Vorhees Street, Holdenville, Oklahoma; and 0 2nd Penn West Street, Holdenville, Oklahoma.
2. **ZECHARIAH ODIE HANKS** resided at and was associated with the address 201 Vorhees Street, Holdenville, Oklahoma; and 203 Vorhees Street, Holdenville, Oklahoma.
3. **CHRISTIAN EUGENE DEWAYNE DUCKWORTH** resided at and was associated with the address 216 Vorhees Street, Holdenville, Oklahoma.

4. **JOLENE ROGERS a/k/a Jolene Copeland** resided at and was associated with the address 307 2nd Penn West, Holdenville, Oklahoma.

5. **ALBERTO RAFAEL MENDEZ LIZARRAGA** resided at and was associated with the address 1400 N Imperial Avenue, El Centro, California.

COUNT ONE

**DRUG CONSPIRACY
[21 U.S.C. §§ 846, 841(a)(1), & 841(b)(1)(A)]**

Numerical paragraphs 1 through 5 of the Introduction are re-alleged and incorporated herein by reference.

Beginning in or about November 2022, the exact date being unknown to the Grand Jury, and continuing until on or about the date of this Indictment, in the Eastern District of Oklahoma and elsewhere, **WINSTON LEVERT HANKS, JR., ZECHARIAH ODIE HANKS, CHRISTIAN EUGENE DEWAYNE DUCKWORTH, JOLENE ROGERS a/k/a Jolene Copeland,** and **ALBERTO RAFAEL MENDEZ LIZARRAGA**, defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree together, and with others known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 21, United States Code, Section 846, as follows:

OBJECTS OF THE CONSPIRACY

1. To knowingly and intentionally distribute 50 grams or more of methamphetamine (actual), a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A); and

2. To knowingly and intentionally possess with the intent to distribute 50 grams or more of methamphetamine (actual), a Schedule II Controlled Substance, in violation of Title 21,

United States Code, Sections 841(a)(1) and 841(b)(1)(A).

MANNER AND MEANS OF THE CONSPIRACY

In order to accomplish the objects of the conspiracy, the defendants and other persons known and unknown to the Grand Jury did the following:

1. Acquired quantities of methamphetamine from sources located in, but not limited to, Calexico, California and El Centro, California.
2. Arranged for the transport of quantities of methamphetamine from Calexico and El Centro, California and other places to the Eastern District of Oklahoma and elsewhere, often by the use of United States Postal Service.
3. Maintained locations and residences in Hughes County, Oklahoma, where methamphetamine was brought to be divided among conspirators for further distribution within the Eastern District of Oklahoma.
4. Collected, stored, and transported sums of United States currency derived from the sale of methamphetamine.
5. Used electronic communications equipment, cell phones, and electronic applications to communicate with co-conspirators both known and unknown to the Grand Jury and with customers to whom they distributed methamphetamine.
6. It was part of the conspiracy and understood that individual conspirators would contact their own sources, cultivate their own customers, and otherwise act independently when they desired, but although there were disagreements, the conspirators, with the knowledge and support of each other's unlawful methamphetamine distribution activities, at some time during the course of the conspiracy, knowingly and intentionally agreed and acted together jointly with

other conspirators to advance the common overall goal of buying, selling, and otherwise possessing with intent to distribute and distributing methamphetamine.

OVERT ACTS

In furtherance of the conspiracy and to effect and accomplish its objectives, the defendants, and others known and unknown to the Grand Jury, committed the following overt acts, among others, in the Eastern District of Oklahoma and elsewhere.

MoneyGram Transfers

<u>Overt Act</u>	<u>On or about</u>	<u>Defendant</u>	<u>Sent (\$)</u>	<u>Received</u>	<u>From</u>
1.	11/21/2022	Unindicted Co-Conspirator 1	\$800.00	Mexicali, Mexico	Holdenville, OK
2.	12/2/2022	WINSTON LEVERT HANKS, JR.	\$750.00	Mexicali, Mexico	Holdenville, OK
3.	12/2/2022	ZECHARIAH HANKS	\$750.00	Mexicali, Mexico	Holdenville, OK
4.	12/4/2022	CHRISTIAN DUCKWORTH	\$750.00	Mexicali, Mexico	Holdenville, OK
5.	12/4/2022	CHRISTIAN DUCKWORTH	\$750.00	Mexicali, Mexico	Holdenville, OK
6.	12/4/2022	Unindicted Co-Conspirator 1	\$950.00	Mexicali, Mexico	Holdenville, OK
7.	12/5/2022	ZECHARIAH HANKS	\$557.00	Mexicali, Mexico	Holdenville, OK
8.	12/11/2022	ZECHARIAH HANKS	\$950.00	Mexicali, Mexico	Holdenville, OK
9.	12/14/2022	ZECHARIAH HANKS	\$950.00	Mexicali, Mexico	Holdenville, OK
10.	12/17/2022	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Holdenville, OK
11.	12/17/2022	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Holdenville, OK
12.	12/18/2022	WINSTON LEVERT HANKS, JR.	\$800.00	Mexicali, Mexico	Shawnee, OK

13.	1/5/2023	Unindicted Co-Conspirator 1	\$800.00	Mexicali, Mexico	Holdenville, OK
14.	1/7/2023	Unindicted Co-Conspirator 1	\$800.00	Mexicali, Mexico	Holdenville, OK
15.	1/8/2023	Unindicted Co-Conspirator 1	\$800.00	Mexicali, Mexico	Holdenville, OK
16.	1/25/2023	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Holdenville, OK
17.	2/4/2023	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Holdenville, OK
18.	2/8/2023	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Holdenville, OK
19.	2/11/2023	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Holdenville, OK
20.	2/12/2023	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Holdenville, OK
21.	3/23/2023	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Holdenville, OK
22.	5/13/2023	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Seminole, OK
23.	5/13/2023	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Seminole, OK
24.	6/13/2023	ZECHARIAH HANKS	\$800.00	Mexicali, Mexico	Holdenville, OK
25.	6/22/2023	ZECHARIAH HANKS	\$800.00	Mexicali, Mexico	Holdenville, OK
26.	6/24/2023	ZECHARIAH HANKS	\$950.00	Mexicali, Mexico	Holdenville, OK
27.	6/28/2023	ZECHARIAH HANKS	\$950.00	Mexicali, Mexico	Holdenville, OK
28.	6/29/2023	ZECHARIAH HANKS	\$800.00	Mexicali, Mexico	Holdenville, OK
29.	7/5/2023	ZECHARIAH HANKS	\$800.00	Mexicali, Mexico	Holdenville, OK
30.	7/9/2023	ZECHARIAH HANKS	\$950.00	Mexicali, Mexico	Holdenville, OK
31.	7/11/2023	ZECHARIAH HANKS	\$800.00	Mexicali, Mexico	Holdenville, OK

United States Postal Service – Parcels Sent

<u>Parcel</u>	<u>On or about</u>	<u>Mailed by</u>	<u>Mailed from</u>	<u>Sent to</u>
1.	2/14/2023	ALBERTO RAFAEL MENDEZ LIZARRAGA	Calexico, CA	203 Vorhees Street, Holdenville, OK
2.	3/8/2023	ALBERTO RAFAEL MENDEZ LIZARRAGA	El Centro, CA	216 Vorhees Street, Holdenville, OK
3.	4/4/2023	ALBERTO RAFAEL MENDEZ LIZARRAGA	El Centro, CA	216 Vorhees Street, Holdenville, OK
4.	5/3/2023	Unknown Co-Conspirator	Calexico, CA	216 Vorhees Street, Holdenville, OK
5.	5/15/2023	ALBERTO RAFAEL MENDEZ LIZARRAGA	Calexico, CA	216 East Commerce Street, Holdenville, OK
6.	7/12/2023	ALBERTO RAFAEL MENDEZ LIZARRAGA	Calexico, CA	216 East Commerce Street, Holdenville, OK

United States Postal Service – Parcels Received

<u>Parcel</u>	<u>Date</u>	<u>Received by</u>	<u>Description</u>
1.	3/13/2023	CHRISTIAN EUGUENE DEWAYNE DUCKWORTH and Unindicted Co-Conspirator 1	Retrieved parcel from the mail carrier at 216 Vorhees Street, Holdenville, OK and delivered the parcel to WINSTON LEVERT HANKS, JR. 's property at 203 Vorhees Street, Holdenville, OK.
2.	4/7/2023	CHRISTIAN EUGUENE DEWAYNE DUCKWORTH and Unindicted Co-Conspirator 1	Retrieved parcel from the mail carrier at 216 Vorhees Street, Holdenville, OK and delivered the parcel to WINSTON LEVERT HANKS, JR. on his property located at 203 Vorhees Street, Holdenville, OK.

3.	5/8/2023	CHRISTIAN EUGUENE DEWAYNE DUCKWORTH and Unindicted Co-Conspirator 1	Retrieved parcel from the mail carrier at 216 Vorhees Street, Holdenville, OK and delivered the parcel to WINSTON LEVERT HANKS, JR. and ZECHARIAH ODIE HANKS , who then travel with the parcel to WINSTON LEVERT HANKS, JR. 's properties located at 203 Vorhees Street, Holdenville, OK; 201 Vorhees Street, Holdenville, OK; and 0 2nd Penn West Street, Holdenville, OK.
4.	5/18/2023	Unknown Co-Conspirator	Retrieved parcel from the mail carrier at 216 East Commerce Street, Holdenville, OK and delivered the parcel to WINSTON LEVERT HANKS, JR. in JOLENE ROGERS a/k/a Jolene Copeland 's motor vehicle.
5.	7/17/2023	Unknown Co-Conspirator	Retrieved parcel from the mail carrier at 216 East Commerce Street, Holdenville, OK

All in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

COUNT TWO

POSSESSION OF A FIREARM IN FURTHERANCE OF A DRUG TRAFFICKING CRIME [18 U.S.C. § 924(c)(1)(A)]

On or about July 17, 2023, in the Eastern District of Oklahoma, the Defendant, **WINSTON LEVERT HANKS, JR.**, did knowingly possess the following firearm, to-wit:

- One (1) North American Arms, revolver, .22 caliber, bearing serial number E412071;
- One (1) Springfield Armory, XD, semi-automatic pistol, .45 ACP caliber, bearing serial number GM492; and
- One (1) Freedom Ordnance, semi-automatic pistol-caliber carbine, 9mm caliber, bearing serial number 049109,

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Drug Conspiracy, as alleged in Count One, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT THREE

**MONEY LAUNDERING CONSPIRACY
[18 U.S.C. §§ 1956(h) & 1956(a)(2)]**

From on or about November 21, 2022 through on or about the date of this Indictment, in the Eastern District of Oklahoma and elsewhere, the defendants, **WINSTON LEVERT HANKS, JR., ZECHARIAH ODIE HANKS, CHRISTIAN EUGENE DEWAYNE DUCKWORTH, JOLENE ROGERS a/k/a Jolene Copeland, and ALBERTO RAFAEL MENDEZ LIZARRAGA**, did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956(h), to wit:

OBJECTS OF THE CONSPIRACY

To knowingly conduct and attempt to conduct a financial transaction of a monetary instrument or funds from a place in the United States to or through a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, that is, Drug Conspiracy and Possession with Intent to Distribute Methamphetamine, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), all in violation of Title 18, United States Code, Section 1956(a)(2)(A).

MANNER AND MEANS

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

On or about the dates set forth below, in the Eastern District of Oklahoma, the defendants: **WINSTON LEVERT HANKS, JR., ZECHARIAH ODIE HANKS, CHRISTIAN EUGENE DEWAYNE DUCKWORTH, JOLENE ROGERS a/k/a Jolene Copeland, and ALBERTO RAFAEL MENDEZ LIZARRAGA**, did transmit, transfer and attempt to transmit and transfer funds, that is United States Currency by wire transfer, from a place in the United States to a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, that is, the felonious importation, receiving, concealment, buying, selling, or otherwise dealing in a controlled substance.

<u>Manner and Means</u>	<u>On or about</u>	<u>Defendant</u>	<u>Sent (\$)</u>	<u>Received</u>	<u>From</u>
1.	11/21/2022	Unindicted Co-Conspirator 1	\$800.00	Mexicali, Mexico	Holdenville, OK
2.	12/2/2022	WINSTON LEVERT HANKS, JR.	\$750.00	Mexicali, Mexico	Holdenville, OK
3.	12/2/2022	ZECHARIAH HANKS	\$750.00	Mexicali, Mexico	Holdenville, OK
4.	12/4/2022	CHRISTIAN DUCKWORTH	\$750.00	Mexicali, Mexico	Holdenville, OK
5.	12/4/2022	CHRISTIAN DUCKWORTH	\$750.00	Mexicali, Mexico	Holdenville, OK
6.	12/4/2022	Unindicted Co-Conspirator 1	\$950.00	Mexicali, Mexico	Holdenville, OK
7.	12/5/2022	ZECHARIAH HANKS	\$557.00	Mexicali, Mexico	Holdenville, OK
8.	12/11/2022	ZECHARIAH HANKS	\$950.00	Mexicali, Mexico	Holdenville, OK

9.	12/14/2022	ZECHARIAH HANKS	\$950.00	Mexicali, Mexico	Holdenville, OK
10.	12/17/2022	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Holdenville, OK
11.	12/17/2022	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Holdenville, OK
12.	12/18/2022	WINSTON LEVERT HANKS, JR.	\$800.00	Mexicali, Mexico	Shawnee, OK
13.	1/5/2023	Unindicted Co-Conspirator 1	\$800.00	Mexicali, Mexico	Holdenville, OK
14.	1/7/2023	Unindicted Co-Conspirator 1	\$800.00	Mexicali, Mexico	Holdenville, OK
15.	1/8/2023	Unindicted Co-Conspirator 1	\$800.00	Mexicali, Mexico	Holdenville, OK
16.	1/25/2023	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Holdenville, OK
17.	2/4/2023	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Holdenville, OK
18.	2/8/2023	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Holdenville, OK
19.	2/11/2023	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Holdenville, OK
20.	2/12/2023	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Holdenville, OK
21.	3/23/2023	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Holdenville, OK
22.	5/13/2023	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Seminole, OK
23.	5/13/2023	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Seminole, OK
24.	6/13/2023	ZECHARIAH HANKS	\$800.00	Mexicali, Mexico	Holdenville, OK
25.	6/22/2023	ZECHARIAH HANKS	\$800.00	Mexicali, Mexico	Holdenville, OK
26.	6/24/2023	ZECHARIAH HANKS	\$950.00	Mexicali, Mexico	Holdenville, OK
27.	6/28/2023	ZECHARIAH HANKS	\$950.00	Mexicali, Mexico	Holdenville, OK
28.	6/29/2023	ZECHARIAH HANKS	\$800.00	Mexicali, Mexico	Holdenville, OK
29.	7/5/2023	ZECHARIAH HANKS	\$800.00	Mexicali, Mexico	Holdenville, OK

30.	7/9/2023	ZECHARIAH HANKS	\$950.00	Mexicali, Mexico	Holdenville, OK
31.	7/11/2023	ZECHARIAH HANKS	\$800.00	Mexicali, Mexico	Holdenville, OK

All in violation of Title 18, United States Code, Sections 1956(h) and 1956(a)(2).

COUNTS FOUR THROUGH TWENTY-EIGHT

LAUNDERING MONETARY INSTRUMENTS

[18 U.S.C. §§ 1956(a)(2) & 2]

On or about the dates set forth in the following table, in the Eastern District of Oklahoma, the defendants, **WINSTON LEVERT HANKS, JR., ZECHARIAH ODIE HANKS,** and **CHRISTIAN EUGENE DEWAYNE DUCKWORTH**, did knowingly conduct and attempt to conduct a financial transaction of a monetary instrument and funds from a place in the United States to and through a place outside the United States as described in the following table, with the intent to promote the carrying on of specified unlawful activity, to wit: Drug Conspiracy, in violation of Title 21, United States Code, Section 846:

<u>Count</u>	<u>On or about</u>	<u>Defendant</u>	<u>Sent (\$)</u>	<u>Received</u>	<u>From</u>
4.	12/2/2022	WINSTON LEVERT HANKS, JR.	\$750.00	Mexicali, Mexico	Holdenville, OK
5.	12/2/2022	ZECHARIAH HANKS	\$750.00	Mexicali, Mexico	Holdenville, OK
6.	12/4/2022	CHRISTIAN DUCKWORTH	\$750.00	Mexicali, Mexico	Holdenville, OK
7.	12/4/2022	CHRISTIAN DUCKWORTH	\$750.00	Mexicali, Mexico	Holdenville, OK
8.	12/5/2022	ZECHARIAH HANKS	\$557.00	Mexicali, Mexico	Holdenville, OK
9.	12/11/2022	ZECHARIAH HANKS	\$950.00	Mexicali, Mexico	Holdenville, OK

10.	12/14/2022	ZECHARIAH HANKS	\$950.00	Mexicali, Mexico	Holdenville, OK
11.	12/17/2022	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Holdenville, OK
12.	12/17/2022	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Holdenville, OK
13.	1/25/2023	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Holdenville, OK
14.	2/4/2023	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Holdenville, OK
15.	2/8/2023	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Holdenville, OK
16.	2/11/2023	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Holdenville, OK
17.	2/12/2023	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Holdenville, OK
18.	3/23/2023	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Holdenville, OK
19.	5/13/2023	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Seminole, OK
20.	5/13/2023	CHRISTIAN DUCKWORTH	\$800.00	Mexicali, Mexico	Seminole, OK
21.	6/13/2023	ZECHARIAH HANKS	\$800.00	Mexicali, Mexico	Holdenville, OK
22.	6/22/2023	ZECHARIAH HANKS	\$800.00	Mexicali, Mexico	Holdenville, OK
23.	6/24/2023	ZECHARIAH HANKS	\$950.00	Mexicali, Mexico	Holdenville, OK
24.	6/28/2023	ZECHARIAH HANKS	\$950.00	Mexicali, Mexico	Holdenville, OK
25.	6/29/2023	ZECHARIAH HANKS	\$800.00	Mexicali, Mexico	Holdenville, OK
26.	7/5/2023	ZECHARIAH HANKS	\$800.00	Mexicali, Mexico	Holdenville, OK
27.	7/9/2023	ZECHARIAH HANKS	\$950.00	Mexicali, Mexico	Holdenville, OK
28.	7/11/2023	ZECHARIAH HANKS	\$800.00	Mexicali, Mexico	Holdenville, OK

All in violation of Title 18, United States Code, Sections 1956(a)(2) and 2.

COUNT TWENTY-NINE

**MAINTAINING DRUG-INVOLVED PREMISES
[21 U.S.C. § 856(a)]**

Beginning in or about November 2022, the exact date being unknown to the Grand Jury, and continuing until on or about the date of this Indictment, in the Eastern District of Oklahoma, the Defendant, **WINSTON LEVERT HANKS, JR.**, did unlawfully and knowingly use a place located at 201 Vorhees Street, Holdenville, Oklahoma; 203 Vorhees Street, Holdenville, Oklahoma; and 0 2nd Penn West Street, Holdenville, Oklahoma for the purpose of manufacturing, distributing, and using methamphetamine, a controlled substance, in violation of Title 21, United States Code, Section 856(a).

FORFEITURE ALLEGATION

[18 U.S.C. §§ 924(d) and 982(a)(1), 21 U.S.C. § 853, & 28 U.S.C. § 2461(c)]

The allegations contained in Counts One through Twenty-Nine of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 924(d) and 982(a)(1), Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461(c).

Upon conviction of the violations charged in Counts One through Twenty-Nine of this Indictment involving violations of Title 18, United States Code, Sections 924(c)(1)(A), 1956(h), 1956(a)(2), and 2, and Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(A), and 856(a), the defendants, **WINSTON LEVERT HANKS, JR., ZECHARIAH ODIE HANKS, CHRISTIAN EUGENE DEWAYNE DUCKWORTH, JOLENE ROGERS a/k/a Jolene Copeland, and ALBERTO RAFAEL MENDEZ LIZARRAGA**, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 924(d) and 982(a)(1), Title 21, United

States Code, Section 853, and Title 28, United States Code, Section 2461(c) any and all of the defendant's right, title and interest in all property constituting and derived from any proceeds obtained directly and indirectly as the result of such offenses, any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offenses, and any property, real or personal, involved in such offense, or any property traceable to such property including, but not limited to:

FIREARMS AND AMMUNITION

- One (1) North American Arms, revolver, .22 caliber, bearing serial number E412071;
- One (1) Springfield Armory, XD, semi-automatic pistol, .45 ACP caliber, bearing serial number GM492;
- One (1) Freedom Ordnance, semi-automatic pistol-caliber carbine, 9mm caliber, bearing serial number 049109;
- Approximately ninety-eight (98) rounds of 9 mm ammunition;
- Approximately thirty-eight (38) rounds of .223 caliber ammunition;
- Approximately thirty-four (34) rounds of .45 ACP caliber ammunition;
- Approximately four (4) rounds of .22 caliber ammunition and one (1) spent shell casing; and
- Approximately nine hundred eighty (980) rounds of 7.62x39 mm ammunition.

MONEY JUDGMENT

An asset forfeiture money judgment in the amount of proceeds obtained by the conspiracy and the defendants.

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property, which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property.

TRUE BILL:

Pursuant to the E-Government Act,
the original indictment has been filed
under seal in the Clerk's Office.

CHRISTOPHER J. WILSON
United States Attorney



Richard J. Lorenz, PA Bar # 314423
Assistant United States Attorney

s / Foreperson
FOREPERSON OF THE GRAND JURY